omt technologies

FCC
445 12th Street, SW,
Washington, DC
20554
RE: MB Docket No. 04-232

> RECEIVED & INSPECTED
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> SEP - 2 2004
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> FCC - MAILROOM
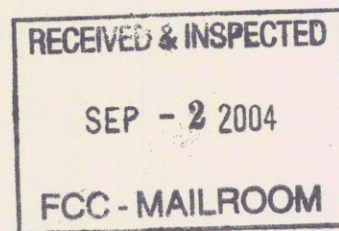
To whom it may concern,

I am writing to you on behalf of OMT Technologies, a Broadcast Solution Provider specializing in broadcast automation software and 24/7 audio recording software (for audible affidavit) for radio broadcasters.

We are contacting you to provide feedback with regards to the NPRM (MB Docket No. 04-232) released on July 7 2004 by the FCC {i.e.: "In this *Notice of Proposed Rulemaking* ("*NPRM*"), we propose to require that broadcasters retain recordings of their programming for some limited period of time (*e.g.*, 60 or 90 days) in order to increase the effectiveness of the Commission's process for enforcing restrictions on obscene, indecent, and profane broadcast programming"}.

We hope this letter and attached documents will provide the FCC with information concerning this issue, and more specifically on the following:

1. How the proposed recording can be accomplished
2. What the cost would be to the licensee.

We are providing this information to help the FCC enhance their enforcement processes through proposed program recording retention requirements for broadcast stations in order to improve the adjudication of complaints.

Item 9 in the Discussion section of MB Docket No. 04-232 suggests that the proposed record retention requirements would affect the record keeping of radio stations. However, digital recording equipment like OMT's iMediaLogger Software is an affordable solution to maintain audible records (or logs) - minimizing the required time and costs. Outdated analog and tape based logging methods are easily replaced by digital logging which is less labor intensive, more reliable, and more cost effective (please see attached document titled "iMedialogger SE" which shows the retail cost of a turnkey digital logging system in greater detail). Please also note: the requirement of storage of 90 days versus 30 days does not impact the cost, as the stated hardware specifications can mange more than 90 days of content logging.

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OMT Technologies has provided digital logging solutions to thousands of radio stations in the United States and around the world. The iMedialogger software is capable of perpetual recording for 90+ days and would provide an ideal solution for radio stations to adhere to the proposed FCC rule. Numerous radio stations in Canada have found our product useful and necessary for the CRTC's (Canadian Radio and Television Commission) required 31 days of content logging.

iMediaLogger is also a cost-effective product, designed to run on a Microsoft Windows operating system with non-proprietary hardware. OMT's application can function with the vast majority of PC brands and models and other 3rd Party Hardware (see attached document titled "iMedialogger SE" for full computer hardware requirements).

OMT's iMediaLogger is currently the #1 selling digital logger and was awarded Radio World's "Cool Stuff" Award for innovation at NAB 2000. Some reputable users of the iMedialogger Solution include: Clear Channel Communications, Cox Radio Incorporated, Fox Radio Network, Infinity Radio, ABC News Radio, American Family Radio, Entercom Inc. and Univision.
To explore more detail on iMediaLogger, please see the attached document titled "iMedialogger SE" which describes the functionality and pricing of the iMedialogger application in greater detail.

I hope this information has provided you with a better understanding of how little money and time this FCC initiative would cost the radio industry. If you have any questions or require further information, please do not hesitate to contact me toll free at 1-888-665-0501 Ext. 213.

Thank you for your time.

Best Regards,

Marieke Wijtkamp
Chief Operating Officer
OMT Inc./Intertain Media
Direct: 204-975-0792
Cell: 204-781-2176
Fax: 204-783-5805
www.omt.net

iMediaLoggerSE

Perpetual Logger & Skimmer Recorder

The most complete and easy-to-use automated audio recording solution perfect for mandatory content logging.

OMT continues to set the standard with the introduction of **iMediaTouchSE** - a cost-effective version of our popular iMediaLogger digital logging software.

iMediaLoggerSE is a software based audio logging, archiving and storage tool, delivering the simplest way to manage your content recording needs with just one workstation.

iMediaLoggerSE replaces outdated bulky, expensive, and maintenance intensive equipment used for logging and skimming including DAT, VCR's, reel to reel, and cassette tape recorders. With iMediaLoggerSE, you will never have to change a tape or reel ever again.
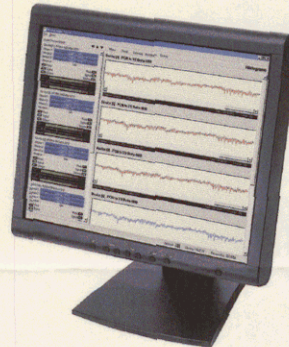
iMediaLoggerSE Features

A summary of the feature list of iMediaLogger and iMediaLoggerSE are below. iMediaLogger provides and expanded feature set, offering the most comprehensive product product on the market. Consult the chart below and see which version of our popular Digital Logging Software meets your stations needs. If you have any questions, please contact your Sales Representative by phone 1-888-665-0501 or email sales@omt.net.

Feature	iMediaLoggerSE	iMediaLogger
24/7 Perpetual Logging	✓	✓
Mic Skimming	✓	✓
Uses non proprietary audio cards	✓	✓
Microsoft Windows 2000 or XP PRO O/S	✓	✓
Upgrades to more channels easily	✓	✓
Supports MP2, MP3, WMA, Real and PCM	✓	✓
Supports up to 12 Start Closures	✓	✓
Recording Access by Website Interface	✓	✓
Uses Media Player for Audio Playback	✓	✓
Visual Histogram & Meters for all channels	✓	✓
One Year Business Hour OMT Support	✓	✓
One Year Free Software Updates	✓	✓
Watchdog System Monitor Option	✓	✓
Connect to an OMT Database		✓
Silence Sensor Detection		✓
Audio Switcher Control		✓
Raw Serial Device Control		✓
Virtual Audio Devices		✓
Time Services		✓
FTP uploading		✓
Mechanical Device Control		✓
Daily or single shot recordings		✓
Supported External Closure Interfaces		✓

* Upgrading from iMediaLoggerSE to the full version of iMediaLogger is easy and inexpensive.

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Choose any Bitrate

Once you have iMediaLoggerSE you'll wonder how your station ever operated without it! One of the most excitng features is its ability to record in multiple formats - MP1, MP2, MP3, Real, WMA and Wav.

Choose any bit rate - You can record up to 4 streams from the single audio source using multiple compression formats and recording qualities to best suit your storage and archiving needs.

Consult the chart to see weekly drive space requirements.

Weekly Drive Space Requirements

Format	Recording Quality		
	Voice	FM	Rebroadcast
Mpeg 1 -			
Layer 1	2.3	9.2	18.5
Layer 2	2.3	9.2	18.5
Layer 3	1.7	7.0	18.5
Real	0.1	0.7	0.8
WMA	0.6	6.9	11.5
PCM(.wav)	9.2	50.8	101.7

Estimated drive space(GB/week) requirements for iMediaLogger recordings

Pricing and Packages

Software & Audio Card Bundle*

		iMediaLogger SE	iMediaLogger
1 Channel	Stereo or Mono	$495.00	$995.00
2 Channel	Mono	$695.00	$1,195.00
2 Channel	Stereo	$795.00	$1,295.00
4 Channel	Mono	$995.00	$1,795.00
4 Channel	Stereo	$1,595.00	$2,395.00
8 Channel	Mono		$3,795.00
8 Channel	Stereo		$4,485.00
12 Channel	Mono or Stereo		$6,485.00

* Each Bundle includes a Professional Audio Card, One Year Support & Software Updates
* iMediaLoggerSE works with any industry standard PC - as per specifications below.
* If you'd like to Upgrade from SE to iMediaLogger please consult your Sales Representative.

Fully Integrated Packages

Save time by purchasing a fully integrated-turnkey iMediaLogger System from OMT.

For an additional $1000 to the above Bundle pricing, receive your chosen iMediaLogger or iMediaLoggerSE software on a proffesional integrated PC.

Your Package will be fully Integrated, built and tested at our OMT Facilities. Our Technical Specialists will assemble your iMediaLogger System to make sure it performs flawlessly! Our packages also include One Year Support, Software Updates and a profesional audio card. You can also substitute the Profesional Tower PC to an Industrial Rackmount PC for an additional $400.

Contact your Sales Representitive for full details about our Integrated Packages.

Minimum Requirements: Intel P4, 256MB Ram, 32MB Graphics, 20GB Sys Drive & CD Rom, 10/100 Network Card, Microsoft Direct Sound Compatible Audio Card, Windows 2000 or XP Pro

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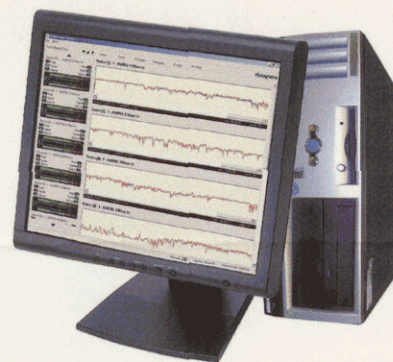
For more information, or to schedule a demo, call toll free 888-665-0501 or visit www.imediatouch.com